

State Water Resources Control Board

December 21, 2016

(Via email and Certified Mail)
CERTIFIED MAIL
NO. 7015 1520 0001 8017 1436

Mr. Collins Kalu
Los Angeles County Metropolitan
Transportation Authority
One Gateway Plaza
Los Angeles, California 90012
kaluc@metro.net

**SUBJECT: FAILURE TO COMPLY; UNDERGROUND STORAGE TANK SYSTEMS
LOCATED AT METRO DIVISION 10, 742 NORTH MISSION ROAD,
LOS ANGELES**

Dear Mr. Kalu:

As of the date of this letter, the State Water Resources Control Board (State Water Board) has not received a complete response to our February 16, 2015 Notice of Violation (NOV)(attached). You are directed to correct the ongoing violations identified in the NOV and submit compliance documentation to the State Water Board and Los Angeles City Fire Department within ten (10) days from the date of this letter.

Please send all compliance documentation to the following:

State Water Board

Ms. Rebecca Green
UST Enforcement Unit
Office of Enforcement
State Water Resources Control Board
801 K Street, 23rd Floor
Sacramento, California 95814
rebecca.green@waterboards.ca.gov

Local CUPA

Mr. Tim Pleasant
Fire Inspector
Los Angeles City Fire Department
200 Main Street, Suite 1700
Los Angeles, California 90012
timothy.pleasant@lacity.org

Failure to comply with this notice may result in an enforcement action by the State Water Board. The State Water Board reserves the right to bring an action against the owner and/or operator of the tank(s) in violation, or it may recommend that Los Angeles City Fire Department pursue enforcement, or Los Angeles City Fire Department may elect to pursue enforcement independently.

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at amantha.henkel@waterboards.ca.gov.

Sincerely,



Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

Attachment: January 27, 2016 Notice of Violation

cc: *(via email only)*

Mr. Royce Long
CUPA Manager
Los Angeles City Fire Department
royce.long@lacity.org

Captain Daniel Dragotto
Los Angeles City Fire Department
daniel.dragotto@lacity.org

Mr. Timothy Pleasant
Fire Inspector
Los Angeles City Fire Department
timothy.pleasant@lacity.org

Mr. James Jimenez
Environmental Compliance & Services Manager
Los Angeles County Metropolitan
Transportation Authority
jjimenezja@metro.net

Mr. Roger Uhden
Sr. Environmental Specialist & Quality Assurance
Los Angeles County Metropolitan
Transportation Authority
uhdenr@metro.net

Ms. Heather Severin
Principal Environmental Specialist
Los Angeles County Metropolitan
Transportation Authority
severinh@metro.net

State Water Resources Control Board

January 27, 2016

(Via email and Certified Mail)
CERTIFIED MAIL
NO. 7015 1520 0001 8019 5319

Mr. Collins Kalu
Los Angeles County Metropolitan
Transportation Authority
One Gateway Plaza
Los Angeles, California 9002
kaluc@metro.net

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEMS
LOCATED AT METRO DIVISION 10, 742 NORTH MISSION ROAD,
LOS ANGELES**

Dear Mr. Kalu:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on January 12, 2016, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and title 23, California Code of Regulations (CCR), chapter 16:

| No. | Violation | Tank | Start Date | Stop Date | Regulation |
|-----|--|---------------|------------------|-----------|-------------------|
| 1 | Failure to Maintain Operating Permit – The facility permit to operate is expired. | All | October 1, 2015 | Ongoing | H&SC 25284(a) |
| 2 | Failure to Maintain Facility and Tank Information (A&B Forms) – Tank forms indicates overfill prevention as a fill tube shut-off valve, however, no valve was observed during the inspection. | T20, T23, T27 | January 12, 2016 | Ongoing | 23 CCR 2711(a)(6) |
| 3 | Failure to Maintain Plot Plan/Site Map – Monitoring site plans do not include the location of the piping or monitoring equipment. | All | January 12, 2016 | Ongoing | 23 CCR 2711(a)(8) |

| No. | Violation | Tank | Start Date | Stop Date | Regulation |
|-----|---|---|------------------|-----------|-------------------|
| 4 | Failure to Tag Monitoring Equipment – The tank gauge used for overfill prevention was not tagged. | T27 | January 12, 2016 | Ongoing | 23 CCR 2641(j) |
| 5 | Failure to Monitor Product Piping – The sensor in the piping sump is unable to detect a leak at the earliest opportunity because it is not positioned beneath the product lines. | T28 | January 12, 2016 | Ongoing | 23 CCR 2630(d) |
| 6 | Failure to Install Line Leak Detectors – Pneumatic pumps have pressurized underground piping without line leak detectors. | T21, T22, T24 and T26 | January 12, 2016 | Ongoing | 23 CCR 2636(f)(2) |
| 7 | Failure to Maintain Secondary Containment – The failed components listed on the secondary containment test have not been repaired or retested. | T18, T19, T22, T24, and T26 | January 5, 2015 | Ongoing | H&SC 25291(a)(2) |
| 8 | Failure to Maintain Secondary Containment – The failed components listed on the secondary containment test have not been repaired or successfully retested. | T20 sump and UDC, T23, T27, T28, T29 and Slope Sump | January 3, 2012 | Ongoing | H&SC 25291(a)(2) |

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and the Los Angeles City Fire Department within sixty (60) days from the date of this letter. Have your Designated Operator make specific notations in the next monthly designated operator report indicating the ongoing violations have been corrected. The monthly designated operator report and any associated photos must be submitted as proof of compliance.

Please send all compliance documentation to the following:

State Water Board

Mr. Thomas Henderson
UST Enforcement Officer
Office of Enforcement
State Water Resources Control Board
1001 I Street, 16th Floor
Sacramento, California 95814
tom.henderson@waterboards.ca.gov

Local CUPA

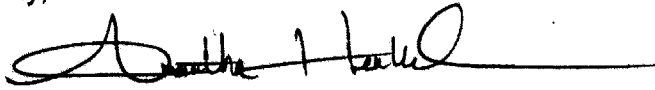
Mr. Bernard Sanchez
Fire Inspector
Los Angeles City Fire Department
200 Main Street, Suite 1700
Los Angeles, California 90012
bernard.sanchez@lacity.org

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

January 27, 2016

If you have any questions, please contact me at (916) 341-5551, or by email at amantha.henkel@waterboards.ca.gov.

Sincerely,



Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

cc: *(via email only)*

Captain Daniel Dragotto
Los Angeles City Fire Department
daniel.dragotto@lacity.org

Mr. Bernard Sanchez
Fire Inspector
Los Angeles City Fire Department
bernard.sanchez@lacity.org

Mr. James Jimenez
Environmental Compliance & Services Manager
Los Angeles County Metropolitan
Transportation Authority
jjimenezja@metro.net

Mr. Roger Uhden
Sr. Environmental Specialist & Quality Assurance
Los Angeles County Metropolitan
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uhdenr@metro.net